

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

Case No. 1:17-MD-2804

THIS DOCUMENT RELATES TO:  
*Track One-B Trial*

**SUMMARY SHEET FOR PHARMACY DEFENDANTS' MOTION IN LIMINE NO. 1  
TO PRECLUDE EVIDENCE, ARGUMENT OR COMMENTS REGARDING: 1) THE  
MILITARY SERVICE, EMPLOYMENT, RELIGIOUS AFFILIATION OR PERSONAL  
EXPERIENCES OF COUNSEL AND STAFF, AND 2) THE WAIVING OR DONATION  
OF ATTORNEY'S OR EXPERT FEES, OR ANY PORTION OF ANY RECOVERY, TO  
CHARITY OR FOR THE BENEFIT OF THE COMMUNITY**

- The Court should exclude as irrelevant any evidence, argument or comments regarding the military experience, employment, religious affiliation or personal experience of counsel or staff. Recognizing the lack of relevance and likely prejudicial impact, the parties in Track 1-A stipulated to this, *see* Doc #2647-*In Limine* Evidentiary Stipulations at 1, but Plaintiffs now refuse to enter into the same stipulation for Track 1-B.
- The Court should also preclude any evidence or argument regarding the waiving or donation of attorney's or expert fees, or any portion of any recovery, to charity or community purposes, all of which is not relevant and any marginal probative value is substantially outweighed by the danger of confusing the issues and/or misleading the jury. Further, such evidence improperly appeals to the personal and community interests of the jury.